Port of Seattle

June 1, 2004

Ms. Allison Ray
WSDOT
999 Third Avenue S., Suite 2424
Seattle, WA 98104

Re: Port of Seattle—Comments on the Viaduct/Seawall DEIS

Dear Ms. Ray:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. We would also like to thank the project team for the effort it has made to date. The amount, quality, and openness of its work are outstanding. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continuing work with the project team to address these and other, as yet unidentified, issues.

Our letter from Port of Seattle Commission President Paige Miller to Secretary McDonald and Mayor Nickels (please see attached) outlines the Port's major concerns regarding the project. Following is a more detailed, technical set of comments. For your ease of use, it repeats—and expands on—the points made in the policy-level letter.

A. Project Long-term

1. Maintaining corridor capacity

Maintaining the capacity of the SR 99 Corridor is critical to our region's economy. A reduction in capacity would have a detrimental effect on freight mobility—lack of capacity would dramatically increase pressure on other facilities that are already stressed. There are three components to corridor capacity:

P.O. Box 1209
Seattle, WA 98111-1209 USA
(206) 728-3000
FAX (206) 728-3252
www.portseattle.org

a. Capacity on the replacement facility itself

Maintaining capacity in the corridor is critical. We are particularly concerned about the ability of the different design alternatives to facilitate freight operations. According to the DEIS, the Surface and Bypass Tunnel alternatives do not maintain existing corridor capacity. Both Surface and Bypass Tunnel alternatives would force a dramatic increase in traffic on Alaskan Way surface, most likely without the benefit of a grade separation at Broad Street. We feel that these two alternatives are not acceptable for this reason. Although both the Aerial and Tunnel alternative maintain existing capacity, we support the six-lane tunnel alternative for the central waterfront because it better supports an economically viable waterfront and livable environment.

b. Capacity on surface arterials

The DEIS indicates that some alternatives may reduce the capacity of surface arterial streets, such as Alaskan Way surface. We urge you to ensure that these arterials, and in particular Alaskan Way surface, do not lose any capacity that supports existing uses, including general-purpose traffic, transit, freight delivery and over-legal trucks, tourist activities, ferries (both state and private), and cruise ship access.

c. Capacity on the BNSF mainline

The DEIS does not address the potential impact of a seawall failure on the ability of the BNSF mainline to carry freight and passenger trains. We are concerned about this scenario and believe it should be further analyzed. If there is a realistic chance that loss of the seawall would make the mainline unusable, contingency plans prepared in conjunction with the viaduct/seawall project should also prepare for rail freight and passenger movement in the absence of the mainline.

2. Need for the Elliott/Western ramps

The DEIS assumes that the Broad Street underpass will be built in advance of the project. We are concerned that a permanent grade separation is no longer planned, although it is still needed. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long-term needs.

The DEIS itself further makes the need for these ramps clear when it indicates that, because BINMIC is not served directly by the regional highway system, "primary access to regional freeways and industrial areas

north of Seattle is via 15th Avenue, connecting to SR 99 by way of the Elliott Avenue and Western Avenue ramps. (p. C-84)" The DEIS also projects that lack of these ramps would cause a higher level of congestion on Alaskan Way surface north of Pike Street (p. C-176). In addition, a replacement facility without these ramps and without a grade separation at Broad Street would cause more conflicts between vehicular traffic and rail traffic on the BNSF mainline at the Broad Street crossing, due to increased traffic (p. C-225/6). With these ramps, the negative impacts on freight mobility and, potentially, cruise ship operations at Pier 66 will be reduced.

3. Provisions for over-legal trucks

The DEIS does not contain sufficient analysis addressing the needs of over-legal trucks under any of the replacement alternatives. Apart from I-5, Alaskan Way surface is the only over-legal north-south truck route through the core of Seattle. Over-legal trucks must be considered as the analysis moves to the next stage. Any design configurations for Alaskan Way surface must ensure that the route is safe and easy to use.

4. Capacity and functionality of rail operations

Adequate rail service is critical for our container operations. For an evaluation of the potential magnitude of the issue, please consider the following: About 70 % of our import containers leave the harbor by rail. Any loss in function would affect all container terminals, with a related impact on our tenants and the regional economy. Our marine terminals support more than 18,000 family-wage jobs and generate $ 895 million in wages, and $ 107 million in state and local taxes each year. (Martin and Associates report, September 2000.)

To ensure that rail remains unaffected, the two railroad companies owning and operating the system must continue to be heard and their needs supported. Further, the project may need rail operations modeling to demonstrate that proposed changes succeed in maintaining capacity and functionality. With regard to the information provided by the DEIS, we have the following comments:

- SIG, Whatcom, and Argo Yards support container terminal operations at T-5 and T-18 as well as T-46. In addition, the SIG and Whatcom tail track, rail access to Terminal 25 (northwest of East Marginal Way and Spokane Street), and the Duwamish rail system are integral parts of the system. All must be preserved.
- Recent Port analysis of rail needs at the Southern Segment supports this point. The tracks dedicated to interim storage capacity for double-stack cars for intermodal container operations are already at capacity, therefore, closing Whatcom Yard during construction would require replacement yards elsewhere prior to closing the yard. We have begun

to look for options to increase double-stack car storage capacity to meet our own needs but have found them to be scarce.

- If the Whatcom Yard is moved east of SR 99, the Port will require that some rail access be maintained on the west side to support existing operations at T-25.

5. Grade separation at Broad Street

- The DEIS traffic flow analysis for 2030 is based on the assumption that there would be an underpass providing grade separation with the BNSF mainline at Alaskan Way surface and Broad Street. It now appears unlikely that it will be built. However the project is proposing construction on of a temporary overpass in this location. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long term needs.
- Furthermore, unless it is evident that a permanent grade separation will be provided at Broad Street, SR 99 and the ramps to Western and Elliott should be designed to accommodate necessary flow without the grade separation. Traffic modeling efforts should reanalyze the functionality of the ramps without the Broad Street underpass, as well as system performance in the vicinity of Broad Street without a grade separation.
- A new arterial connected to Belltown could provide an alternative to Broad Street during train-crossing delays. We are interested in exploring the potential of Armory Way, as alluded to in the Bypass Tunnel Alternative Option.

6. Complementary regional system upgrades and connections

a. The Mercer Corridor

This is a critical east-west connection in the north end of the study area. While the DEIS contains some discussion on improvements to Mercer Street, closure of a portion of Broad Street, and a new overpass at Thomas Street, it provides only very limited analysis. These changes appear to reduce already constrained capacity between the waterfront and I-5 and to sever the only designated east-west truck route in the north end of downtown. From reading the DEIS, is not clear to us how these elements relate to the replacement of the viaduct and the seawall. We hope that further analysis will clarify these issues and develop a solution that does not require loss of capacity in an already severely congested east-west corridor.

b. Westside north-south link

The viaduct functions as a north-south link for the western side of the highway system through Seattle and King County. It complements and relieves I-5 capacity through Seattle. Specific connections enhanced by the viaduct are the SR 509 connection to Sea-Tac Airport and the 15th Avenue West Corridor toward Ballard and Port facilities at Terminal 91, Fisherman's Terminal and Shilshole Bay.

c. East-west through the Duwamish (SR 519 and Spokane Street)

- The east-west connections between the waterfront and Interstates 5 and 90 at SR 519 are critically important to the Port and its customers. The preferred alternative should maximize the capacity of this corridor and allow for future improvements.
- Similarly, the Spokane Street Viaduct provides essential corridor for Port container traffic. We anticipate this will also be an important corridor during viaduct construction and support the seismic and safety project proposed by the City here.

7. High mode split assumptions

The DEIS analysis of the traffic impacts of the various alternatives is based on a travel demand model that "may overestimate the mode shift that could occur by 2030. (p. C-14) " According to the DEIS, the traffic model assumes a 76% ride share to the downtown core. Additional sensitivity analysis, evaluating the impact of a smaller increase in transit use, indicated that the impact on the replacement facility itself may not be very high due to facility constraints elsewhere. However, there would be a 27-29 % increase in traffic on already congested arterials in the downtown area. We urge you to further evaluate and mitigate the impacts of a lower than expected mode split, in particular with regard to Alaskan Way surface and East Marginal Way.

8. Access and impacts to Port properties

Many of the Port's facilities, and the tenants using these facilities, will be impacted by the project. It will be critical for the project team to communicate with our tenants to understand their needs before a final design decision is made.

Before we outline concerns regarding specific Port facilities we would like to indicate that we are very concerned that the DEIS does not address detrimental impacts on our cruise ship terminals—in particular P-66, in the heart of the north central segment of the project. We hope that future

analysis will provide a more in-depth analysis of the needs of our cruise ship operations. Following is an overview of our operations:

This summer, we expect about 150 cruise ship port calls at T-30 (about 90 port calls) and P-66 (about 60 port calls). This generates about 570,000 passenger and over 6,000 truck trips to and from the two terminals.

The majority of ships calling on Seattle today provide capacity for between 1,800 and 2,800 passengers. The trend for new ships coming on line is an increase in passenger capacity. In the past five years, average capacity has grown from about 2,000 to almost 3,000 passengers. Cruise ships making port calls today generate the following number of passenger trips:

Table 1:
Number of Vehicle Trips Generated by Passengers on a Cruise Ship

Mode of Travel	Vehicle Occupancy	1,800 Passenger Ship		2,800 Passenger Ship	
		Drop-off	Pick-up	Drop-off	Pick-up
Pass. Veh. Parked [a]	2.0/veh.	165	165	210	210
Pass. Veh. Drop-off [b]	2.0/veh.	110	110	140	140
Buses [b]	33.0/veh.	100	100	128	128
Taxis [b]	2.0/veh.	110	110	140	140
Total		485	485	618	618

[a] Each drop-off and pick-up generates one trip on each end of the cruise. [b] Each drop-off and pick-up generates two trips on each end of the cruise. (Source: Heffron Transportation, Traffic Impact Analysis for Cruise Ship Terminal at Terminal 30, September 3, 2002.)

Our cruise terminals operate from May to October. Port calls occur generally on Monday, Thursday, Friday, Saturday and Sunday, trips occur during about an 8-9 hour time-frame between 8 am and 5pm. The economic impact of the cruise ship for the regional economy is significant: In 2004, the Port's cruise ship terminals are estimated to generate about 1,700 jobs and more than $ 200 million in business revenue. During the next 10 years, we expect our cruise ship business to grow by about 50%.

a. South Segment: Terminal 46

- Design solutions for the South Segment must avoid that Port property which is needed for container operations. (Neither SR 99 ramps, nor the proposed ferry holding lot or access roads for Colman Dock should infringe on the container terminal.) Alternatives as shown in DEIS would severely curtail the functionality of container operations. T-46 is our smallest operating container terminal, its current acreage represents the minimum space requirement for our tenant. Further loss of space would significantly reduce the terminal's viability for container operations, to the detriment of the local economy. Today, the terminal directly supports 1,366 jobs in the local economy, resulting in $ 73.4 million in personal income and $ 69.9 million in state and local taxes annually.

- For the design assumptions, the SIG/Whatcom tail track is located on the eastern edge of T-46 on Port property. While this location is compatible with one terminal operator with fully secured terminal operations, other uses may require improved access to the site. In order to ensure that T-46 access will not be directly blocked by train operations on this track, the Port's easement agreement with the City for the tail track requires that the City to relocate it at the request of the Port. Design solutions for the south-end segment must ensure that the tail track does not permanently impede access to T-46.
- We would also like to note that the Port is currently in the process of implementing a $70 million investment in infrastructure supporting container operations at T-46. Some of the design solutions illustrated in the DEIS would require demolition and relocation of these brand-new facilities.
- SR 519/T-46 intersections and South Segment design—The DEIS illustrates design options for this segment that do not support container operations at T-46. Since the deadline for work included in the DEIS, Port staff have been working with the design team to develop solutions that better address the needs of T-46 as a container terminal. While much progress has been made, further analysis of design and operational details is needed to clarify the impacts on access to the terminal both as a container facility and for potential alternative land uses before a decision can be made. This includes further work on both the aerial and surface options for this segment to determine the best solution for inclusion in the FEIS. We will continue to work with the project team to address the Port's concerns. We require solutions that maintain current levels of operations:
  - Acceptable access for trucks to/from our gates;
  - Retaining a good truck connections between T-46 and north SIG yard; and
  - Retaining good truck access to Argo Yard, Main SIG Yard and the regional highway system.
- The narrative in Appendix U on T-46 includes Parcel 390.1. We believe this parcel actually belongs to the Coast Guard and is not part of T-46. This should be clarified.

b. Other Port facilities in the South Segment

- Connections between SR 519 and East Marginal Way also provide truck access to our terminals at T-25, T-18, T-5, and

the SIG Yard. Good access between these roadways must be maintained.

- As noted above, passenger vehicle and bus access to the Cruise Ship Terminal at T-30 must be retained during and after construction. Peak volumes at this location require a center turn lane.
- We support efforts to dedicate East Marginal Way to freight and local access (for employees and cruise ship terminal access).
- As recommended in the City/Port Access Duwamish study of 1999, further design efforts could evaluate the potential to significantly improve bicycle safety along East Marginal Way if a road-separated bike path were added in the reconfiguration of the SR 99 and Whatcom Yard.

c. Central: Pier 48

- The DEIS assumes that the Port will sell Pier 48 to the Washington State Department of Transportation for improvements to the ferry terminal at Colman Dock. This sale has not yet been negotiated, yet the only access currently under consideration uses the P-48 uplands. An evaluation of potential alternatives to this approach is needed.
- We also would like to make sure that the existing public access points—Periscope Park & Alaskan Square—at P-48 will be replaced. The DEIS indicates that Alaska Square Park will be displaced by the viaduct replacement project to provide new access to Colman Dock, Periscope Park will be unaffected by viaduct replacement but displaced by the Colman Dock project. (Appendix H, most alternatives.) Both parks were required mitigation for the T-46 project. Public access provided by these parks must be replaced. If public access provided by Alaska Square Park is not replaced at project expense, the Port must be released from its obligation.
- The project would displace existing tenants at Pier 48, aquatic/vessel uses, and would eliminate a large pay parking lot that is available to the public in an area where parking options are very limited. These impacts should be mitigated.

d. North Waterfront: Cruise ship operations at Pier 66

- Our review of the DEIS indicates that the project team has conducted only a limited review of the impact of various design alternatives on cruise ship operations.

- We are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. The lane is critical for loading and unloading of cruise ship passengers. Through a street use permit from the City of Seattle, our tenants currently have exclusive use of the south-bound, western curb/parking lane in front of P-66 during port calls. During peak loading hours, delivery trucks may be lined up in a north-bound through-lane, waiting to enter our apron. Anecdotally, our staff indicates that during port calls traffic utilizes the capacity of all existing lanes. Further information is available to the project team through the T-30 traffic impact analysis (Heffron Transportation, 2002), or by observing traffic on a cruise ship call day.
- Thus, we urge the project team to re-evaluate current solutions regarding the capacity and design of Alaskan Way surface to ensure adequate access for passengers and deliveries for cruise terminal at Pier 66 and Victoria Clipper at Pier 69.

e. North Waterfront: Other issues related to Pier 66 (the Port's "Central Waterfront Project")

- In addition to our first cruise ship terminal, Pier 66 is also home to the Bell Harbor International Conference Center, a restaurant complex, a maritime museum, grocery market, a sandwich shop and several public access viewpoints. Our World Trade Center is located on the east side of Alaskan Way surface. These businesses rely on access along Alaskan Way surface. Both pedestrian and vehicular access is important.
- The DEIS states that "No seawall work is required for any of the alternatives between Blanchard and Battery Streets adjacent to the Bell Harbor International Conference Center." The Port facilities at P-66 sit atop a bulkhead built around 1915, and strengthened in the 1990s with construction of Bell St. Pier. We are concerned, however, about the potential impact of soil strengthening work along Alaskan Way on the stability of our bulkhead. The project team should consult with our engineers on this issue as part of the FEIS process.
- In developing Pier 66, the Port carried out substantial cleanup work along the waterfront. There is a four acre sediment cap and a very healthy habitat mitigation site within the marina. The DEIS indicates that no seawall work will be required in this area. Should ongoing analysis show that seawall work is required at Pier 66, however, care must be taken not to disrupt this area.

f. North Waterfront: Lenora Street Pedestrian Bridge

- The DEIS indicates that the bridge would be demolished for all alternatives. It also states that it is "not expected to be reconstructed in its current form although pedestrian access to the waterfront may be provided on the corridor. The public seating and waterfront viewing area at the top of the elevator/stairway tower is less likely to be replaced because of the cost of an elevated structure." (Aerial, Tunnel, Bypass, and Surface alternatives in Appendix H.)
- This facility is owned and maintained by the Port. The DEIS lists "view enjoyment and relaxation" (p. H-14) as primary uses. More importantly, however, the bridge is subject to a pedestrian easement that was required as part of a street vacation agreement with the City of Seattle. It provides a critical pedestrian connection between the central waterfront and Pike Place Market. It is an integral element of the Port's Bell Street Pier/Central Waterfront Project and should be replaced. If the bridge is not replaced at project expense, the Port must be compensated and released from its agreement with the City.

g. North Waterfront: Pier 69

As indicated above, we are concerned that not all design alternatives for Alaskan Way surface north of Pike maintain a curb lane. Similar to cruise ship operations, the lane is critical for Victoria Clipper passenger drop-off and pick-up. Additionally, Seafloor Surveys Inc. leases office space from the Port at Pier 69. The Port of Seattle has its headquarter in that location. Future analysis must address the needs of our tenants and staff.

9. Environmental impacts

a. Air quality

As the DEIS acknowledges, it does not include an air quality conformity determination. Air quality modeling and cumulative analysis conducted for the FEIS should take into account the fact that marine vessel, rail and truck air emissions will need to be factored into a conformity analysis.

Although the Seattle waterfront and Duwamish area were re-designated from PM-10 non-attainment areas, this area has come close to exceeding the NAAQS during stagnant conditions. If cumulative emissions exceed acceptable levels, emission sources may need to be reduced in the future to avoid operational and economic sanctions associated with NAAQS nonconformity.

Thus, future analysis and mitigation must take into consideration that the cumulative impacts of the viaduct project and other emission sources may place constraints on the Port's and tenant operations and activities. It should also include a scenario that gives less weight to voluntary traffic reduction. (See comments under Section A.7. above.)

b. Noise

The DEIS provides limited analysis of noise generated by the new facility. We are concerned, however, that there are no baseline measurements for Terminal 46, Piers 48 and 66 or the World Trade Center. We would like to better understand the potential impacts of increased noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, as well as Pier 69, and request further analysis. Should the final design solution significantly increase noise levels, the project would need to provide mitigation.

c. Parks and recreation

Our concerns about the potential loss of public access owned and operated by the Port are outlined above in sections 8.c and 8.f.

d. Fisheries, wildlife, and habitat

Potential aquatic habitat compensation actions linked to seawall, tunnel, and Colman Dock improvements are described at four existing Port facilities:

1. Pier 70/Myrtle Edwards Park—this is assumed to include Elliott Bay Park as well;
2. Pier 89;
3. Pier 48; and
4. The northeast corner of Terminal 5.

However, the Port has also identified these sites for mitigation of its own projects if future Port development requires habitat mitigation. The Port's costs for future mitigation would be much higher if the preferred alternative utilized these sites and the Port were forced to find alternative mitigation sites. Our preference is to retain these sites for Port use. If this is not possible, the project must mitigate these additional costs to the Port.

e. Hazardous Waste

WSDOT's analysis has recommended that additional site investigations be completed for certain Port properties. If WSDOT must complete these investigations prior to viaduct construction, Port and tenant operations will be disturbed during investigation and any subsequent remediation. We request that WSDOT clarify timing and investigation requirements because the Port's existing

operations, and possibly future development of these properties, could be substantially impaired by WSDOT's investigation and analysis.

B. Construction Impacts

The construction impacts for the replacement of the viaduct and the seawall will be massive and should be identified as significant adverse impacts. We understand that the analysis carried out for the DEIS is limited and will be more substantial once a preferred alternative has been identified. Our letter to Secretary Douglas and Mayor Nickels outlines three structured approaches that will allow the Port to comment on the next steps of analysis and negotiate any mitigation needs before the FEIS analysis is completed.

Construction staging and detours will have a major impact on many of our tenants. We have attempted to address their concerns in our comments and will continue to do so throughout the process. However, it will be essential for the project team to contact these tenants and work with them as construction staging, detour and closure plans are developed.

Similarly, the project will require takings under any design alternative. At this point, the impact on the Port is unclear. The DEIS states that a Relocation Plan will be developed as part of the FEIS. We expect the opportunity to review and comment on the plan.

As indicated above, the DEIS contains only a very limited amount of information on construction impacts. Regarding that limited information, we have the following comments:

1. Temporary facilities

The DEIS contains two designs for temporary facilities intended to maintain an "open corridor." Both facilities would have a profound impact on the waterfront. The DEIS contains no analysis of these impacts. In-depth analysis will be needed to understand the implications of each alternative, including cost, corridor traffic flow, and the impact on businesses and traffic flow on the North Waterfront.

a. Broad Street Detour

Specific issues regarding this temporary facility that must be evaluated include:

- Traffic volumes/impact on Alaskan Way surface south of the touchdown.
- Impact on cruise ship access at Pier 66.

- Access to the "north apron" of Pier 69, which provides loading docks and minor on-site parking, including ADA parking.
- Impact on the Victoria Clipper's operation. Currently, Victoria Clipper ground access relies on a curb lane on Alaskan Way surface adjacent to their loading dock at P-69 for taxi queuing, charter bus parking and loading, as well as private automobile pick-up and drop-off.
- Impact on south-bound movement of traffic from Ballard/Interbay, given that the Broad Street underpass will not be built in advance of this project. The DEIS states that "Southbound traffic from Ballard/Interbay area would travel under the railroad tracks at Broad Street by using an underpass." (p. 23)

b. Battery Street Flyover:

Specific issues to be evaluated regarding this temporary facility include the impacts of the columns supporting the facility on:

- Traffic flow on Alaskan Way surface; and
- Access for our tenants at Pier 66, including the cruise ship terminal loading area, the world trade center, Bell Harbor International Conference Center.
- Impacts to other waterfront businesses and residences.
- Construction duration

2. Analysis of "closed corridor" impacts

a. Analysis of SR99 closure

In our July 2002 comments, we indicated that it is critical that the existing viaduct continue to operate until the replacement is complete. We made this statement because of the magnitude of the likely impacts of full closure for all through traffic on SR 99. However, analysis carried out for the DEIS indicates that maintaining traffic flow on SR 99 throughout the entire construction period significantly adds to project costs and construction duration. It would be valuable to evaluate the potential effects of a full closure of both the entire corridor and individual segments of the corridor for the entire construction period and determine the trade-offs associated with this approach. The analysis should include, but not be limited to the impacts on:

- Project cost;
- Construction duration;

- Traffic flow on regional transportation system and local arterial streets, and related socio-economic costs;
- Businesses on the waterfront, including our tenants at T-46 and Piers 66 and 69; and
- Any other trade-offs.

b. Analysis of periodic SR 99 closures

Similarly, even periodic closures as described in the DEIS —especially closures with several weeks of duration—would have a significant impact on the regional system and on our tenants along the waterfront. More substantive analysis will be needed. This includes in particular the impacts on Hanjin's operations at T-46 and cruise ships at P-66 and T-30:

- Should the corridor be closed for prolonged periods, it would be critical for freight mobility that general-purpose traffic be channeled through the Duwamish on 1st and 4th Avenues South. This would allow East Marginal Way to be dedicated to local access to adjacent properties and terminals (including the US Coast Guard), as well as to drayage operations between container terminals and the intermodal rail yards.
- Cruise ship port calls occur during the summer (between May and October) and mostly on weekends. These are the times when, according to the DEIS, periodic closures would occur. Future analysis must evaluate the impact on cruise ship operations.

3. Coordination with other projects

The DEIS contains almost no information on other projects that may be under construction at the same time. This includes the Monorail, I-5, Spokane Street and other projects on city streets, the Ferry Terminal, Sound Transit light rail, and many other projects. Constrained operation or periodic closures of SR 99 during construction will put additional pressure on an already stressed regional system. The cumulative impact of closures and detours related to any of these other projects, both within the study area and on the regional system, could be crippling. This would have a major impact on the ability of the region to do business. We encourage advance construction, fast-tracking to complete other projects in the corridor before construction starts. If that is not possible, we urge you to work with other projects to minimize the cumulative impacts associated with other projects under construction at same time. We will work with the project team to ensure that the impact on our tenants and port operations is minimized.

The DEIS also lists redevelopment of T-46 for alternative uses as a project that could occur during the same time as replacement of the viaduct and seawall. At this time, the Port is committed to Hanjin, our current tenant, and its success in operating T-46 as a container terminal. Our primary goal is to ensure that access to T-46 is preserved in a fashion that is supportive of container operations.

4. Capacity and functionality of rail operations

- As stated earlier (see section A.4.), to maintain the functionality of all three container terminals, the capacity and efficiency ("adjacency") of rail operations in the harbor cannot be reduced. This applies to the construction period as well.
- The tail track, and its existing length, is required to maintain railroad operations. Construction activities, staging and detours must be designed to maintain the track without interruption.
- Demolition and construction of the central segment will occur very close to the north portal of the downtown rail tunnel on the BNSF mainline. The portal must be protected to ensure the safety and reliability of rail operations for freight and passengers on the mainline.

5. Freight mobility

a. Separation of freight and general-purpose traffic

We support the project team's intent to focus general-purpose traffic on 1st and 4th Avenues and dedicate East Marginal Way to freight and local access. This will help maintain the functionality of T-46 as container terminal and support cruise ship operations at T-30. We are concerned, however, that traffic impacts generated by use of East Marginal Way as a haul route may impact access to our properties along East Marginal Way. A thorough analysis will be needed.

b. Provisions for truck movement

The DEIS outlines some of the impacts of construction on freight mobility but does not evaluate truck detours and alternative routes sufficiently. We are concerned that that there are no reliable alternatives to the SR 99 corridor in the city. This is particularly important for over-legal trucks and trucks carrying flammable materials. The DEIS indicates that Alaskan Way surface would be reduced to one lane in each direction; rail crossing and pedestrian/bicycle conflicts will reduce speed and reliability. Trucks longer than 27 feet are currently prohibited from the downtown core between 6:00 am and 6:00 pm. We urge you to develop alternative truck routes and provide for improvements on local truck routes in advance of construction to mitigate some of

these impacts. This may include reevaluating the truck restrictions in the downtown core.

c. Impacts on east-west corridors

The DEIS does not adequately identify the impacts of construction to east-west corridors in the Seattle. According to the DEIS, the projected loss of capacity, increase in travel time, and reduction in access points in the SR 99 corridor will shift trips—including truck trips to and from BINMIC—to I-5 and other north-south arterials already experiencing severe congestion today. This could have major impacts on the east-west routes used to access these other north-south corridors, including Spokane Street, Lander Street, SR 519, the Mercer/Roy Street corridor, Nickerson Street, and N 39th Street. The FEIS should document the impacts on these facilities and mitigate them.

6. Access and impacts to Port Properties

The DEIS alludes to use of Port property for staging and other purposes during construction. We anticipate working with the project team where temporary use of Port property may be required, and to negotiate temporary construction easements from the Port and our tenants. Where construction would adversely impact access for the Port and/or its tenants, we will need to negotiate access and mitigation with the project team.

We are also concerned about the following issues:

a. Lane reductions on East Marginal Way and Alaskan Way surface

The DEIS indicates that East Marginal Way and Alaskan Way surface would be reduced to one lane in each direction from S Massachusetts to Broad Street for much of the construction period for most alternatives. We are concerned about potential impact of increased traffic on East Marginal Way on our container terminals, the cruise terminal at T-30, and Horton Street Maintenance Shop. Passenger and delivery access to T-30, truck access to T-46 and drayage movement to the railroad yards, passenger and delivery access to Piers 66-69 must be maintained.

b. Utilities and public services

The DEIS discusses construction impacts on utilities and public services and states that "most impacts for the Tunnel Alternative" occur in the south end from Spokane to King. It also warns about potential unplanned interruptions or accidental disconnections (p. 25). We are concerned about the risk to our facilities, in particular T-46, T-30, and the SIG Yard. These facilities require uninterrupted service.

c. Access to T-30 and T-46

The location of construction staging areas and detours in the south-end could potentially have a major impact on both our cruise ship terminal at T-30 and container operations at T-46. Staging areas and detours must be designed to maintain unimpeded access to T-46. The long-term effects of losing Hanjin to another port because of negative impacts from construction on access to the terminal are unacceptable.

d. Access to Pier 66 for cruise ship operations

The FEIS must address passenger drop-off and delivery access to the cruise terminal at P-66 during construction. The DEIS states that "locations for pedestrian access and bus and taxi cab pick-ups will likely move around throughout construction to accommodate construction activities." (P-95) There appear to be no provisions for curb space. We are concerned that these factors will make it very difficult to maintain cruise ship operations at P-66. Cruise ships make a significant contribution to the local economy. It can be lost if cruise operators move their vessels to a different harbor to avoid access problems due to construction. More work will be required to ensure adequate access during port calls. (Please see also the discussion on cruise ship access needs under Section A.8.d.)

e. Access to Pier 66 in general

Other tenants at Pier 66, at the World Trade Center on the east side of Alaskan Way, and along the waterfront may also be severely impacted. We are concerned about the impacts of the viaduct/seawall project on their business livelihood and access.

f. Access to Pier 69

We are also concerned about access to Pier 69 during construction, both for our tenants and our staff. The Victoria Clipper also requires access for passenger drop-off and deliveries and depends on a curb/parking lane.

7. The Flexible Transportation Package

The Port supports the project's aggressive traffic management program encouraging alternatives modes of transportation. However, we cannot support the truck restrictions the DEIS mentions as a possible component of the package. Freight mobility should not be curtailed to maintain capacity for single-occupant vehicle travel. Much of the movement of trucks destined for warehouse and distribution centers is based on strict schedules that support just-in-time deliveries. Many of these facilities, and our own terminals have coordinated schedules. If trucks were, for

example, forced to operate at night, a significant portion of the supply chain would be forced to change hours of operation as well. We are also concerned that the mode split that is assumed for the construction period may not be achievable. We encourage the project team to more thoroughly evaluate this issue and will work with the team to develop a package that provides for adequate freight movement for inclusion in the FEIS.

8. Environmental issues

a. Air quality

- The DEIS correctly notes the current attainment status of the region, however, this area has come close to violating the National Ambient Air Quality Standards for ozone and particulate matter during adverse weather events. Increased $PM_{2.5}$ emissions due to diesel construction equipment and traffic congestion could jeopardize the region's attainment status.
- Emissions from construction could leave little room in the airshed for other projects. The project must mitigate adverse construction impacts as necessary to allow for development of other projects given constraints in the region's air quality.
- The FEIS should address cumulative impacts of construction related tailpipe and fugitive emissions from concurrent projects and from increased congestion and should evaluate air toxics impacts of construction. It should also include mitigation to address adverse impacts, including phasing where possible.
- We endorse minimizing diesel particulate emissions as described on Page 72 of Appendix F. A design that does not improve the current and projected no build levels of service will most likely compromise air quality in the future unless provision and use of adequate transportation alternatives coupled with VMT-reducing land use decisions are assured.
- Vehicular emissions estimates seem to assume emissions are all re-entrained road dust (Page 21, Appendix Q). The analysis does not take into account primary particulates from the vehicles nor emissions of NOx and SOx that contribute to secondary nitrate and sulfate PM10 in ambient air.
- The magnitude of the construction emissions and emissions from traffic congestion during construction are essential to the cumulative impact analyses, which should include a scenario that gives less weight to voluntary traffic reduction. We request review and comment of these analyses before they are final.

b. Noise

We are concerned about the impacts of construction noise on Terminal 46, Pier 48, Pier 66 and the World Trade Center, and Pier 69. Should noise from construction activities impact existing uses at these or other facilities owned by Port, the project would need to provide mitigation.

Thank you again for the opportunity to participate in this project and comment on this Draft Environmental Impact Statement. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall. Please do not hesitate to contact me at 206-728-3818, or Christine Wolf, our new Regional Transportation Program Planner for the Seaport, at 206-728-3458, if you have any questions.

Sincerely,

Stephanie Jones, PE, AICP
Manager
Seaport Strategic Planning and Policy
Port of Seattle